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*Johnson & Johnson Health Care Systems Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**JOHNSON & JOHNSON**

**HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS  
SCRIPTS, INC., AND ACCREDO  
HEALTH GROUP, INC.,**

Defendants.

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

:

Hon. Freda L. Wolfson, Special Master

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**NOTICE OF MOTION TO SEAL**

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COUNSEL:

PLEASE TAKE NOTICE that on April 7, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with (i) the Motion of Defendant Save On SP, LLC (“SaveOnSP”) to Compel JJHCS to Produce Documents Relating to Spending Projections, dated December 19, 2024, with related briefing dated January 21 and February 7, 2025 (ECF Nos. 496, 498 & 521), filed on January 23 and February 10, 2025 (the “Business Plans Motion”), and (ii) SaveOnSP’s Motion to Compel JJHCS to Add Lena Kane as a Custodian, dated December 19, 2024, with related briefing dated January 22 and February 7, 2025 (ECF Nos. 497, 499 & 522), filed on January 23 and February 10, 2025 (the “Lena Kane Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of the Business Plans Motion (ECF Nos. 496, 498 & 521) and the Lena Kane Motion

(ECF Nos. 497, 499 & 522), attached as Exhibits A and B, respectively to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

PLEASE TAKE FURTHER NOTICE that SaveOnSP does not object to the relief requested.

Respectfully submitted,

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Dated: February 26, 2025